REMARKS

Prior to entry of this amendment, Claims 1-20 were pending in this application. No claims are added or canceled. Hence, Claims 1-20 are presently pending in this application.

OVERVIEW OF AN EMBODIMENT OF THE INVENTION

The present application is entitled, and describes, "A Method of Resolving Conflicts in Access Control Lists Based on Subsumption Relations." In one embodiment, such a method is described as a non-routing table integrity check (paragraph 0285) that is associated with management of a network routing device, such as a router. A "subsumption relation" is a relation in which there are two or more elements in a router's access list where the earlier one is more general than the later one (paragraph 0285). For example, a subsumption relation is present when an access list contains an entry that includes an IP address/mask pair that identifies a network and node that is more general than an entry, that is processed later than the foregoing entry, that includes an IP address/mask pair that identifies the same network but does not identify a node. Thus, one entry "subsumes" the other.

The presence of a subsumption relation in a given access list is considered an error in the integrity of the access list (paragraph 0285). Claim 1 recites a method of analysis of access list subsumption in routing devices which determines whether an access list includes entries that have a subsumption relation and, consequently, an error or conflict in the given access list.

REJECTION BASED ON PRIOR ART

Rejection under 35 U.S.C. §102(a)

The Office Action ("Action") rejected Claims1-20 under 35 U.S.C. §102(a) as allegedly anticipated by Dobbins et al. ("*Dobbins*"; U.S. Patent No. 5,509,123). This rejection is traversed.

Claim 1

For a proper anticipation rejection, a reference must show each and every feature of a claim in the same combination as claimed. Connell v. Sears, Roebuck & Co., 722 F.2d 1542, 1548, 220 USPQ 193, 198 (Fed. Cir. 1983). *Dobbins* does not disclose, explicitly or implicitly, all of the features recited in Claim 1.

Dobbins discloses an object-oriented architecture for non-protocol-specific network layer routing that includes "a mechanism by which the forwarding of network packets is subject to access control set by network management" (col. 11, lines 7-9; cited in the Action). The citations of *Dobbins* (col. 10, line 65 through col. 12, line 2) that allegedly anticipate Claim 1 discuss access lists and IP address/mask pairs. However, Applicants are not claiming access lists that contain address/mask pairs, per se, or a specific use thereof as discussed in *Dobbins*. Rather, Claim 1 recites a method of analysis of access lists that comprises **determining whether an access list contains a subsumption relation** by **determining whether a first ("earlier") element in the access list has a more general or equal address/mask pair than a second ("later") element in the access list**, and storing a report of such elements.

Hence, the features recited in Claim 1 are clearly absent from the disclosure of *Dobbins*. *Dobbins* merely sets forth an architecture which distributes critical network

routing functionality and system behavior into autonomous router objects, with no mention of access list integrity checks. *Dobbins* does not even mention any access list integrity checking, nor does *Dobbins* refer to subsumption relations within a given access list. For these reasons, a prima facie case of anticipation is not established in the Action, and withdrawal of the rejection of Claim 1 under 35 U.S.C. §102 is requested.

Claims 2-4

Because Claims 2-4 depend from Claim 1, Claims 2-4 are patentable over *Dobbins* for at least the same reasons described in reference to Claim 1, where it is shown that *Dobbins* does not disclose the method recited in Claim 1. Therefore, withdrawal of the rejection of Claims 2-4 under 35 U.S.C. §102 is requested.

In addition, *Dobbins* does not disclose the additional features recited in Claim 2, which are that **one or more of the access lists is related to input packets and one or more of the access lists is related to output packets**. In contrast, *Dobbins* states that "[e]ach interface may associate with one and only one access list" (col. 11, lines 19-21; underline added). Hence, a given interface of *Dobbins* could not be associated with one or more access list for input packets and one or more access list for output packets, because that would violate the "one and only one access list" constraint of the *Dobbins* architecture. For this additional reason, Claim 2 is patentable over *Dobbins*.

Claims 5-20

Claims 5-20 were rejected under the same rationale as Claims 1-4 were rejected. Therefore, the foregoing reasons that prove the patentability of Claims 1-4 over *Dobbins* are equally applicable to Claims 5-20. Therefore, withdrawal of the rejection of Claims 5-20 is requested.

CONCLUSION

For at least the reasons indicated above, Applicants submit that all of the pending claims currently under consideration (1-20) present patentable subject matter over the references of record, and are in condition for allowance. Therefore, Applicants respectfully request that a timely Notice of Allowance be issued in this case. If the Examiner has questions regarding this case, the Examiner is invited to contact Applicant's undersigned representative.

To the extent necessary, a petition for an extension of time under 37 C.F.R. §1.136 is hereby made. Please charge any shortages in fees due in connection with the filing of this paper, including extension of time fees, or credit any overages to Deposit Account No. 50-1302.

Respectfully Submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

Date: 5/18/04

John D. Henkhaus
Reg. No. 42,656

(408) 414-1080
Fax: (408) 414-1076
1600 Willow Street
San Jose, CA 95125-5106

CERTIFICATE OF MAILING

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